

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE:

SSA BONDS ANTITRUST LITIGATION

*This Document Relates To All Actions*

1:16-cv-03711-ER

**STIPULATION AND ORDER RE: VOLUNTARY DISMISSAL OF  
CLAIMS, WITHOUT PREJUDICE, AGAINST TD SECURITIES LIMITED**

WHEREAS, on December 22, 2016, the Court appointed Quinn Emanuel Urquhart & Sullivan, LLP and Robbins Geller Rudman & Dowd LLP as Interim Co-Lead Counsel for Plaintiffs in this consolidated action (Dkt. No. 88);

WHEREAS, on November 3, 2017, the Court ordered that Interim Co-Lead Counsel for Plaintiffs file a Consolidated Amended Class Action Complaint (Dkt. No. 305);

WHEREAS, on November 3, 2017, Sheet Metal Workers Pension Plan of Northern California, and Iron Workers Pension Plan of Western Pennsylvania ("Named Plaintiffs") filed a public version of their Consolidated Amended Class Action Complaint (Dkt. No. 306);

WHEREAS, Defendant TD Securities Limited ("TDSL"), based on a reasonably diligent inquiry into its business and practices from January 1, 2005 to the present, represents:

TDSL has never transacted in supranational, sovereign, and agency ("SSA") bonds;

TDSL has never had a desk or unit responsible for transacting in SSA bonds;

TDSL has never employed any SSA bond trader or salesperson;

TDSL has never played a role in the marketing, pricing, or execution of SSA bonds, even on transactions carried out or booked through other entities; and

None of TDSL's employees or agents, while acting in such capacity, ever transacted in SSA bonds or played any role in the marketing, pricing, sale or acquisition of SSA bonds.


NOW, THEREFORE, ON THE BASIS OF THE FOREGOING REPRESENTATIONS, IT IS HEREBY STIPULATED AND AGREED:

1. That the above-captioned action, *In re SSA Bonds Antitrust Litigation*, No. 16-cv-3711 (ER), is, as to only TD Securities Limited, dismissed without prejudice and without costs to any party as against any other party.

2. The dismissal is without prejudice. Should discovery lead to facts providing a basis for joining TD Securities Limited back into the case, the parties agree that any statute of limitation, statute of repose, or any other time-related defense or claim shall be tolled as to TD Securities Limited from the date of this stipulation until the date that such discovery was received by Plaintiffs.

IT IS SO ORDERED.

DATED: March 5, 2018

  
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THE HONORABLE EDGARDO RAMOS  
UNITED STATES DISTRICT JUDGE



David W. Mitchell  
Brian O. O'Mara  
Carmen A. Medici  
ROBBINS GELLER RUDMAN & DOWD  
LLP  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)  
davidm@rgrdlaw.com  
bomara@rgrdlaw.com  
cmedici@rgrdlaw.com

*Interim Co-lead Counsel*



Daniel L. Brockett  
Sascha N. Rand  
Steig D. Olson  
Jeremy D. Andersen  
Thomas J. Lepri  
QUINN EMANUEL URQUHART  
& SULLIVAN, LLP  
51 Madison Avenue, 22nd floor  
New York, NY 10010  
Telephone: 212/849-7000  
212/849-7100 (fax)  
danbrockett@quinnemanuel.com  
sascharand@quinnemanuel.com  
steigolson@quinnemanuel.com  
jeremyandersen@quinnemanuel.com  
thomaslepri@quinnemanuel.com

*Interim Co-lead Counsel*



Joel M. Cohen  
James H.R. Windels  
Bryan McArdle  
DAVIS POLK & WARDWELL LLP  
450 Lexington Avenue  
New York, NY 10017  
Telephone: (212) 450-4000  
Fax: (212) 701-5800  
joel.cohen@davispolk.com  
james.windels@davispolk.com  
bryan.mcardle@davispolk.com

*Attorneys for Defendant TD Securities  
Limited*